

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

W.A.O., *et al.*, on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

UR M. JADDOU, *et al.*,

Defendants.

*Civil Action No. 2:19-cv-11696-MCA-
MAH*

**NOTICE OF MOTION AND
JOINT MOTION FOR
PRELIMINARY APPROVAL OF
PROPOSED STIPULATION OF
SETTLEMENT AND DISMISSAL
UNDER FRCP 23(e)**

PLEASE TAKE NOTICE that the Named Plaintiffs, on behalf of themselves and the certified Class they represent, together with the Defendants, respectfully move the Court to enter an Order, in accordance with Federal Rule of Civil Procedure 23(e):

1. Preliminarily approving the proposed Stipulation of Settlement and Dismissal appended to this motion as Exhibit A;
2. Approving notice to the Class as follows:
 - a. approving the Notice of Proposed Settlement, in English and Spanish, appended to this motion as Exhibit B;
 - b. approving the methods for notice to the Class as set forth in Section IV of the proposed Stipulation of Settlement and Dismissal; and
 - c. setting the deadline for dissemination of such notice;

3. Setting out the conditions, terms, and deadline for Class Members who so wish to file objections to the proposed Stipulation of Settlement and Dismissal and to be heard at the Final Approval Hearing;

4. Scheduling a Final Approval Hearing for a date at the Court's convenience.

In support of this motion, the Parties file herewith:

1. A Memorandum of Law in Support of Joint Motion for Preliminary Approval of Stipulation of Settlement and Dismissal; and

2. A proposed Order Granting Joint Motion for Preliminary Approval of Stipulation of Settlement and Dismissal.

January 4, 2022

Respectfully submitted,

s/ Catherine Weiss

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